

Exhibit A

Initial Analysis, Strategy and Defense

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
04/30/2018	RJS	4.5	Review and analysis of Defamation Complaint; conferences regarding same; research regarding potential responses to complaint
04/30/2018	CH	2.75	Email correspondence regarding Defamation Complaint; conferences regarding same
05/01/2018	RJS	0.75	Telephone conference regarding response to Defamation Complaint
05/01/2018	RJS	1	Additional conferences regarding response to Defamation Complaint; email correspondence regarding same
05/01/2018	SF	0.75	Telephone conference regarding response to Defamation Complaint
05/03/2018	RJS	1	Telephone conference regarding response to Defamation Complaint
05/03/2018	RJS	1.5	Prepare letter to opposing counsel in response to Defamation Complaint; research in support of same
05/04/2018	RJS	1.5	Review and revise letter to opposing counsel regarding Defamation Complaint; email correspondence regarding same
05/10/2018	RJS	1.75	Telephone conferences regarding strategy for defending against Defamation Complaint; further conference regarding same
05/10/2018	CH	3.75	Telephone conferences regarding strategy for defending against Defamation Complaint; further conference regarding same
05/23/2018	CH	1	Email correspondence regarding service of Defamation Complaint and legal strategy; meeting regarding same and waiver of service of summons
05/23/2018	RJS	0.25	Prepare waiver of service of summons; email correspondence regarding same
05/24/2018	RJS	1	Research regarding SDNY service and filing requirements; email correspondence regarding same

Initial Analysis, Strategy and Defense

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
06/07/2018	CH	0.75	Telephone conferences and meetings regarding defending against Defamation Complaint; email correspondence regarding case status and strategy
06/12/2018	RJS	3.75	Review and prepare response to email from opposing counsel regarding initial pretrial conference; research SDNY local rules and judge's individual rules of practice regarding initial pretrial conference; prepare motion to continue initial pretrial conference; conferences regarding same
06/12/2018	SF	1.75	Research judge's individual rules of practice and SDNY local rules regarding letter motions; prepare notice of appearance for C. Harder; review and analysis of evidence for potential use in support of letter motion to continue pretrial conference
06/12/2018	CH	2.75	Meetings regarding case strategy; prepare memorandum regarding case history, status and strategy; email correspondence with opposing counsel regarding continuance of initial scheduling conference; review Consent Motion to continue initial pretrial conference
06/13/2018	RJS	1.5	Review and revise Consent Motion to continue initial pretrial conference; conferences regarding same; email correspondence with opposing counsel regarding same
06/13/2018	SF	0.75	Revise and finalize Notice of Appearance of C. Harder and Consent Motion
06/13/2018	CH	0.75	Conferences regarding Consent Motion to continue initial pretrial conference
08/08/2018	SF	1.5	Draft Notice of Related Case for CDCA
08/08/2018	RJS	1.5	Review and revise Notice of Related Case for CDCA; conference and email correspondence regarding same
08/09/2018	RJS	0.5	Further review and revisions to Notice of Related Case; conferences regarding same
08/09/2018	CH	2.5	Telephone conferences regarding case status and strategy; conferences regarding strategy
08/21/2018	SF	3.75	Legal research regarding potential discovery

Initial Analysis, Strategy and Defense

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES	
08/29/2018	RJS	0.5	Review and analysis of email regarding response to Complaint; telephone conference regarding same	
08/29/2018	SF	0.5	Review research regarding potential discovery; email correspondence regarding same	
08/31/2018	SF	2.75	Further legal research regarding potential discovery; draft analysis regarding same	
Total		47		

Total Hours Per Attorney	
CH	14.25
RJS	21
SF	11.75
Total	47

<u>Motion to Transfer</u>			
DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
05/01/2018	DE	3.75	Legal research regarding Motion to Transfer; telephone conference regarding same
05/01/2018	RJS	4.5	Begin drafting Motion to Transfer; legal research regarding same
05/01/2018	SF	5	Research regarding Motion to Transfer; conference regarding same; draft insert for Motion
05/02/2018	RJS	4.5	Continue drafting Motion to Transfer; legal research regarding same
05/03/2018	RJS	3.5	Continue drafting Motion to Transfer; legal research regarding same
05/04/2018	SF	3.25	Continue drafting insert for Motion to Transfer; legal research regarding same
05/07/2018	RJS	6.5	Continue drafting Motion to Transfer; legal research regarding same
05/07/2018	SF	5.25	Continue drafting Motion to Transfer; legal research regarding same
05/08/2018	SF	4.5	Continue drafting insert for Motion to Transfer; legal and fact research regarding same
05/09/2018	SF	2.75	Continue drafting insert for Motion to Transfer; legal research regarding same; begin drafting Declaration of C. Harder in support of Motion
05/09/2018	RJS	5.5	Continue drafting Motion to Transfer; legal research regarding same
05/10/2018	RJS	4.5	Continue drafting Motion to Transfer; legal research regarding Motion
05/11/2018	RJS	3.5	Continue drafting Motion to Transfer; legal research regarding Motion

<u>Motion to Transfer</u>			
DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
05/14/2018	RJS	6.5	Continue drafting Motion to Transfer; legal research regarding same; continue drafting Declaration of C. Harder in support of Motion
05/16/2018	RJS	3.25	Continue drafting Motion to Transfer; legal research regarding same
05/17/2018	RJS	5.5	Review and revise Motion to Transfer; legal research regarding same; continue drafting Declaration of C. Harder in Support of Motion
05/18/2018	RJS	3.5	Review and revise Motion to Transfer and Declaration of C. Harder in support of Motion; email correspondence regarding same
05/24/2018	TN	3.5	Fact research regarding Motion to Transfer
05/24/2018	CH	2	Review and revise Motion to Transfer; conferences regarding same
05/25/2018	TN	0.75	Fact research regarding Motion to Transfer
05/25/2018	RJS	3.5	Review and revise Motion to Transfer
07/16/2018	RJS	4.5	Review and revise Motion to Transfer
07/17/2018	RJS	3.5	Review and revise Motion to Transfer and Declaration of C. Harder in support of Motion
07/18/2018	RJS	6.5	Review and revise Motion to Transfer and Declaration of C. Harder in support of Motion; email correspondence and conferences regarding same
07/18/2018	SF	2	Revise Motion to Transfer; legal research in support of Motion

<u>Motion to Transfer</u>			
DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
07/19/2018	SF	4.5	Draft Request for Judicial Notice in support of Motion to Transfer; legal research regarding same; review and revise Motion to Transfer and Declaration of C. Harder in Support of Motion
07/19/2018	RJS	4.5	Review and revise Motion to Transfer; conferences and email correspondence regarding same
07/19/2018	CH	2	Review and revise Motion to Transfer; conferences regarding same
07/20/2018	RJS	4.25	Review and revise Motion to Transfer; conferences regarding same
07/20/2018	SF	0.5	Legal research regarding Motion to Transfer
07/20/2018	CH	2	Review and revise Motion to Transfer; conference regarding same
07/23/2018	RJS	3.5	Review and revise Motion to Transfer; conferences regarding same
07/23/2018	SF	4.75	Review and Revise Motion to Transfer, Declaration of C. Harder and Request for Judicial Notice in support of Motion
07/23/2018	CH	2	Review and Revise Motion to Transfer and Declaration of C. Harder in support of Motion; conferences and email correspondence regarding same
08/06/2018	RJS	1.5	Review and analysis of Opposition to Motion to Transfer; email correspondence regarding same
08/06/2018	DE	3.75	Research regarding Reply in Support of Motion to Transfer; begin drafting Reply; telephone conference regarding same
08/06/2018	DE	2	Research regarding Reply in support of Motion
08/06/2018	CH	1.5	Review and analysis of Opposition to Motion to Transfer

Motion to Transfer

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
08/06/2018	RJS	1.25	Telephone conference regarding Reply in support of Motion to Transfer
08/07/2018	DE	0.75	Research regarding Reply in Support of Motion to Transfer
08/07/2018	CH	1.25	Email correspondence with opposing counsel regarding stipulation to transfer case to CDCA; review proposed stipulation; conference regarding same
08/07/2018	RJS	0.5	Review and analysis of proposed stipulation to transfer case to CDCA; email correspondence and telephone conference regarding same
08/07/2018	DE	0.75	Review and analysis of proposed stipulation to transfer case to CDCA; draft correspondence regarding same
Total		143.25	

Total Hours by Attorney

CH	10.75
RJS	84.75
DE	11
SF	32.5
TN	4.25
Total	143.25

Motion to Strike

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
08/08/2018	DE	4	Legal research regarding Anti-SLAPP Motion
08/09/2018	RJS	0.75	Telephone conference regarding Anti-SLAPP Motion
08/09/2018	RJS	0.5	Conferences regarding Anti-SLAPP Motion
08/09/2018	RJS	0.25	Email correspondence regarding Anti-SLAPP Motion
08/09/2018	SF	2.75	Legal research regarding Anti-SLAPP Motion; conference regarding same
08/09/2018	TN	4.25	Fact research regarding Anti-SLAPP Motion; conference regarding same
08/09/2018	DE	0.75	Telephone conference regarding Anti-SLAPP Motion
08/09/2018	DE	5.75	Legal research regarding Anti-SLAPP Motion
08/09/2018	CH	0.75	Telephone conference regarding Anti-SLAPP Motion
08/10/2018	TN	2.75	Fact research regarding Anti-SLAPP Motion
08/10/2018	DE	4.25	Begin drafting Anti-SLAPP Motion; Legal research regarding same; draft correspondence regarding Motion
08/11/2018	DE	2.75	Continue drafting Anti-SLAPP Motion; legal research regarding same
08/12/2018	DE	3	Continue drafting Anti-SLAPP Motion; legal and fact research regarding same
08/13/2018	TN	1	Fact research regarding Anti-SLAPP Motion
08/13/2018	DE	1.75	Telephone conferences regarding Anti-SLAPP Motion; legal research regarding same

Motion to Strike

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
08/13/2018	DE	3.75	Continue drafting Anti-SLAPP Motion; legal and fact research regarding same
08/14/2018	TN	3.25	Fact research regarding Anti-SLAPP Motion
08/14/2018	DE	2.25	Legal research regarding Anti-SLAPP Motion
08/15/2018	DE	1.75	Legal research regarding Anti-SLAPP Motion
08/16/2018	RJS	0.75	Email correspondence regarding Anti-SLAPP Motion
08/16/2018	CH	0.5	Email correspondence regarding Anti-SLAPP Motion; conference regarding same
08/19/2018	DE	3.75	Continue drafting Anti-SLAPP Motion; legal research regarding same
08/20/2018	TN	1.5	Fact research regarding Anti-SLAPP Motion
08/20/2018	DE	1.25	Telephone conferences regarding Anti-Slapp Motion
08/20/2018	DE	3.75	Continue drafting Anti-SLAPP Motion; legal and fact research regarding same
08/20/2018	CH	3	Review and revise meet and confer letter to opposing counsel regarding Anti-SLAPP Motion; prepare for and attend meet and confer conference with opposing counsel; conferences and email correspondence regarding same
08/21/2018	TN	1	Fact research regarding Anti-SLAPP Motion
08/21/2018	DE	4	Continue drafting Anti-SLAPP Motion; legal and fact research regarding same
08/23/2018	RJS	0.5	Meet and confer conference with opposing counsel regarding Anti-SLAPP Motion; email correspondence regarding same

Motion to Strike

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
08/23/2018	RJS	0.5	Telephone conferences regarding Anti-SLAPP Motion
08/23/2018	DE	4.75	Continue drafting Anti-SLAPP Motion; legal research regarding same
08/23/2018	DE	1	Telephone conferences regarding Anti-SLAPP Motion
08/23/2018	CH	0.5	Email correspondence regarding Anti-SLAPP Motion
08/24/2018	RJS	7.5	Review and revise Anti-SLAPP Motion; draft Declaration of C. Harder in support of Motion; email correspondence regarding same
08/24/2018	DE	4.75	Review and revise Anti-SLAPP Motion; legal research regarding same
08/25/2018	DE	2.25	Review and revise Anti-SLAPP Motion
08/25/2018	CH	3.5	Review and revise Anti-SLAPP Motion and Declaration of C. Harder in support of Motion
08/26/2018	RJS	1.5	Review and Revise Anti-SLAPP Motion; email correspondence regarding same
08/26/2018	DE	3	Review and revise Anti-SLAPP Motion; legal research regarding same
08/26/2018	CH	2	Review and revise Anti-SLAPP Motion; email correspondence regarding same
08/27/2018	RJS	5.5	Review and revise Anti-SLAPP Motion and Declaration of C. Harder in Support of Motion; review and analysis of exhibits in support of Motion; conferences regarding Motion
08/27/2018	TN	7	Continue preparing exhibits in support of Anti-SLAPP Motion; review and revise Declaration of C. Harder in support of Motion
08/27/2018	DE	4	Revise Anti-SLAPP Motion; legal research regarding same

Motion to Strike

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
08/27/2018	CH	5	Review and revise Anti-SLAPP Motion and Declaration of C. Harder in support of Motion; conferences and email correspondence regarding same
08/27/2018	SF	2.75	Review and revise Anti-Slapp Motion; legal research regarding same
08/28/2018	RJS	0.25	Telephone conference with opposing counsel regarding Anti-SLAPP Motion; email correspondence regarding same
08/28/2018	TN	2.75	Fact research regarding Anti-SLAPP Motion
08/28/2018	DE	3	Begin drafting Reply in support of Anti-SLAPP Motion; legal research regarding same; telephone conference regarding same
08/28/2018	CH	1.25	Fact research regarding Anti-SLAPP Motion; email correspondence regarding strategy for Reply in Support of Anti-Slapp Motion and hearing on same
08/29/2018	RJS	4.5	Legal research regarding Reply in support of Anti-SLAPP Motion; telephone conference and email correspondence regarding same
08/29/2018	TN	1	Fact research regarding Reply in support of Anti-SLAPP Motion
08/29/2018	DE	3.75	Continue drafting Reply in Support of Anti-SLAPP Motion; legal research regarding same
08/30/2018	RJS	1	Legal research regarding Reply in support of Anti-SLAPP Motion; email correspondence regarding same
08/30/2018	RJS	0.5	Conferences regarding Reply in support of Anti-SLAPP Motion
08/30/2018	RJS	1.5	Legal research regarding Reply in support of Anti-SLAPP Motion; telephone conference regarding same
08/30/2018	DE	2.75	Continue drafting Reply in support of Anti-SLAPP Motion; legal research regarding same

Motion to Strike

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
08/30/2018	TN	1	Fact research regarding Reply in Support of Anti-SLAPP Motion
08/30/2018	CH	1	Conferences and email correspondence regarding Reply in Support of Anti-SLAPP Motion and hearing on same
08/31/2018	DE	0.75	Telephone conference regarding Reply in support of Anti-SLAPP Motion
08/31/2018	DE	3	Continue drafting Reply in Support of Anti-SLAPP Motion; legal research regarding same
09/03/2018	DE	7.75	Continue drafting Reply in Support of Anti-SLAPP Motion; legal research regarding same; telephone conferences regarding same
09/04/2018	RJS	2.75	Review and analysis of Opposition to Anti-SLAPP Motion and supporting declarations; conferences regarding Reply in support of Motion
09/04/2018	DE	1.5	Telephone conference regarding Reply in support of Anti-SLAPP Motion
09/04/2018	DE	4.75	Continue drafting Reply in Support of Anti-SLAPP Motion; legal research regarding same
09/04/2018	CH	1	Review and analysis of Opposition to Anti-SLAPP Motion and supporting declarations; conference regarding Reply in support of Motion
09/05/2018	DE	1.75	Continue drafting Reply in Support of Anti-SLAPP Motion; legal research regarding same
09/06/2018	SF	2	Draft evidentiary objections to Declarations of Clifford and Avenatti in support of Opposition to Anti-SLAPP Motion
09/06/2018	DE	5.25	Continue drafting Reply in Support of Anti-SLAPP Motion; legal research regarding same
09/07/2018	DE	2.5	Continue drafting Reply in Support of Anti-SLAPP Motion; legal research regarding same

Motion to Strike

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
09/07/2018	CH	2	Review and revise Reply in support of Anti-SLAPP Motion; email correspondence regarding same
09/08/2018	RJS	1	Review and revise Reply in support of Anti-SLAPP Motion; email correspondence regarding same
09/08/2018	DE	1.5	Review and revise Reply in support of Anti-SLAPP Motion; legal research regarding same
09/09/2018	DE	1.25	Review and revise Reply in support of Anti-SLAPP Motion; email correspondence regarding same
09/10/2018	SF	1.75	Review and revise Reply in support of Anti-SLAPP Motion and evidentiary objections to declaration in support of Opposition; telephone conference regarding evidentiary objections
09/10/2018	RJS	4.5	Review and revise Reply in support of Anti-SLAPP Motion; conferences and email correspondence regarding same
09/10/2018	DE	2.75	Revise Reply in support of Anti-SLAPP Motion; review and revise evidentiary objections to declarations in support of Opposition to Motion
09/16/2018	DE	4.75	Preparation for hearing on Anti-SLAPP Motion
09/18/2018	DE	0.75	Telephone conference regarding hearing on Anti-SLAPP Motion
09/19/2018	CH	1.5	Preparation for hearing on Anti-SLAPP Motion
09/21/2018	CH	2.5	Preparation for hearing on Anti-SLAPP Motion
09/21/2018	RJS	1.5	Conferences regarding hearing on Anti-SLAPP Motion
09/22/2018	DE	1.25	Preparation for hearing on Anti-SLAPP Motion; email correspondence regarding same

Motion to Strike

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
09/22/2018	CH	2.75	Preparation for hearing on Anti-SLAPP Motion; email correspondence regarding same
09/23/2018	RJS	1	Conference regarding hearing on Anti-SLAPP Motion
09/23/2018	DE	2.75	Preparation for hearing on Anti-SLAPP Motion; telephone conference regarding same
09/23/2018	CH	6	Preparation for hearing on Anti-SLAPP Motion; email correspondence regarding same
09/24/2018	RJS	2.25	Preparation for hearing on Anti-SLAPP Motion; conference regarding same
09/24/2018	RJS	3.5	Attend hearing on Anti-SLAPP Motion; travel for same
09/24/2018	CH	6.25	Preparation for hearing on Anti-SLAPP Motion; attending hearing on Motion; conferences regarding preparation and hearing; email correspondence regarding hearing on Motion
Total		230.5	

Total Hours by Attorney	
CH	39.5
RJS	42
DE	114.25
SF	9.25
TN	25.5
Total	230.5

Motion for Attorneys' Fees

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
10/15/2018	RJS	2.5	Review and analysis of Court Order on Anti-SLAPP Motion; Review and analysis of firm invoices in preparation for Motion for Attorneys' Fees
10/15/2018	SF	0.75	Review and analysis of Court Order on Anti-SLAPP Motion; Legal research regarding Motion for Attorneys' Fees
10/16/2018	SF	1.25	Legal research regarding Motion for Attorneys' Fees
10/17/2018	RJS	2.5	Draft meet and confer letter to opposing counsel regarding Motion for Attorneys' Fees; conferences and email corresponding regarding same; further review and analysis of firm invoices
10/17/2018	SF	3	Legal research in support of Motion for Attorneys' Fees, conference regarding same; revise meet and confer letter to opposing counsel regarding same; conference regarding same
10/17/2018	SF	1.25	Prepare summary of fees and billing records in support of Motion for Attorneys' Fees
10/18/2018	RJS	0.5	Conference regarding Motion for Attorneys' Fees
10/18/2018	RJS	1	Fact research regarding Motion for Attorneys' Fees
10/19/2018	SF	4.25	Continue preparing summary of fees and billing records in support of Motion for Attorneys' Fees; conference regarding same
10/19/2018	SF	0.75	Legal research in support of Motion for Attorneys' Fees
10/19/2018	RJS	1	Review and revise summary of fees and billing records in support of Motion for Attorneys' Fees; conference regarding same
10/19/2018	SF	6	Begin drafting Motion for Attorneys' Fees; conference regarding same
10/20/2018	SF	1	Legal research in support of Motion for Attorneys' Fees
10/22/2018	RJS	1.25	Review and revise follow-up meet and confer email to opposing counsel regarding Motion for Attorneys' Fees; conferences regarding same; email correspondence to opposing counsel regarding same; telephone calls to opposing counsel's office

Motion for Attorneys' Fees

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
10/22/2018	RJS	3.25	Continue review and revision of summary of fees and billing records in support of Motion for Attorneys' Fees; conferences regarding same
10/22/2018	SF	7	Continue drafting Motion for Attorneys' Fees; legal research in support of same
10/23/2018	RJS	1	Continue review and revision of summary of fees and billing records in support of Motion for Attorneys' Fees; conferences regarding same
10/23/2018	RJS	2.5	Begin drafting insert for Motion for Attorneys' Fees
10/23/2018	SF	7	Continue drafting Motion for Attorneys' Fees; legal research in support of same
10/24/2018	RJS	3.5	Continue drafting insert for Motion for Attorneys' Fees; conferences regarding same
10/24/2018	SF	8.25	Continue drafting Motion for Attorneys' Fees; legal research in support of same; conferences regarding same
10/25/2018	SF	6	Continue drafting Motion for Attorneys' Fees; review and revise same; email correspondence and conferences regarding same
10/25/2018	RJS	5.5	Review and revise Motion for Attorneys' Fees; email correspondence and conferences regarding same
10/26/2018	RJS	1.5	Prepare for meet and confer with opposing counsel regarding Motion for Attorneys' Fees; email correspondence with opposing counsel re same; further review and revision of summary of fees and billing records in support of Motion for Attorneys' Fees; conferences regarding same
10/26/2018	RJS	0.5	Meet and confer telephone conference with opposing counsel regarding Motion for Attorneys' Fees
10/26/2018	RJS	4.5	Continue review and revision of Motion for Attorneys' Fees; conferences and email correspondence regarding same
10/26/2018	SF	6.5	Continue review and revision of Motion for Attorneys' Fees; conferences regarding same; legal research regarding same; draft declaration in support of same; prepare and revise exhibits in support of same

Motion for Attorneys' Fees

DATE	ATTORNEY	TIME BILLED	GENERAL DESCRIPTION OF SERVICES
10/26/2018	CH	4.5	Review and revise Motion for Attorneys' Fees and supporting declaration
Totals		88.5	

Total Hours by Attorney	
CH	4.5
RJS	31
SF	53
Total	88.5

Totals

Category	Total Hours Per Category	Total Fees Per Category
Initial Strategy	47	\$34,707.97
Motion to Transfer	143.25	\$102,977.32
Motion to Strike	230.5	\$139,899.21
Motion for Fees	88.5	\$63,975.00
Total	509.25	\$341,559.50

Attorney	Total Hours Per Attorney	Total Fees Per Attorney	Effective Hourly Rate Per Attorney
CH	69	\$58,073.33	\$841.64
RJS	178.75	\$135,221.84	\$756.49
DE	125.25	\$76,651.34	\$611.99
SF	106.5	\$62,462.01	\$586.50
TN	29.75	\$9,150.98	\$307.60
Total	509.25	\$341,559.50	

Exhibit B

From: Ahmed Ibrahim <aibrahim@eaganavenatti.com>
Sent: Wednesday, June 13, 2018 10:57 AM
To: Ryan Stonerock
Cc: Michael J. Avenatti; Anthony Harwood; Charles Harder
Subject: RE: Clifford - Trump; SDNY Action

Ryan,

At the end of the paragraph beginning “On or before that date” and ending (the “California Action”), please add:
“Plaintiff intends to oppose the Motion to Transfer.”

With that change, you have our consent to file.

Ahmed

From: Ryan Stonerock [mailto:RStonerock@harderllp.com]
Sent: Wednesday, June 13, 2018 10:43 AM
To: Ahmed Ibrahim
Cc: Michael J. Avenatti; Anthony Harwood; Charles Harder
Subject: FW: Clifford - Trump; SDNY Action

Ahmed:

The letter-motion is required to be filed as soon as possible. Please let us know your comments, if any, by 12 noon PST today. Absent any comments, we will file the version that we sent you last night (attached). Thank you.

Best,



RYAN J. STONEROCK
HARDER LLP
RSTONEROCK@HARDERLLP.COM
(424) 203-1600

From: Ryan Stonerock
Sent: Tuesday, June 12, 2018 10:10 PM
To: 'Ahmed Ibrahim' <aibrahim@eaganavenatti.com>
Cc: Michael J. Avenatti <mavenatti@eaganavenatti.com>; Anthony Harwood <aharwood@harderllp.com>; Charles Harder <charder@harderllp.com>
Subject: RE: Clifford - Trump; SDNY Action

Ahmed:

Attached is a draft consent letter-motion, which is required by the Court’s Notice of Initial Pretrial Conference.

Please review and confirm that it's acceptable for filing at your earliest convenience.

Thanks,



RYAN J. STONEROCK
HARDER LLP
RSTONEROCK@HARDERLLP.COM
(424) 203-1600

From: Ahmed Ibrahim [<mailto:aibrahim@eaganavenatti.com>]

Sent: Tuesday, June 12, 2018 6:21 PM

To: Charles Harder <charder@harderllp.com>

Cc: Michael J. Avenatti <mavenatti@eaganavenatti.com>; Anthony Harwood <aharwood@harderllp.com>; Ryan Stonerock <RStonerock@harderllp.com>

Subject: RE: Clifford - Trump; SDNY Action

Charles,

We are happy to stipulate to a 45 day continuance of the Conference. That will give you enough time to file your motion. Our last day to file a request for a continuance is June 18. If this works, I can put together a draft of the stipulation.

Ahmed

From: Charles Harder [<mailto:charder@harderllp.com>]

Sent: Tuesday, June 12, 2018 6:05 PM

To: Ahmed Ibrahim

Cc: Michael J. Avenatti; Anthony Harwood; Ryan Stonerock

Subject: Clifford - Trump; SDNY Action

Dear Mr. Ibrahim:

We were very surprised to receive your email of a few minutes ago, notifying us of an Initial Pretrial Conference in New York next week. You have known about this Conference for the past 6 weeks, and were required to notify us about it, but waited until today to do so. We need request a 90-day continuance of the Conference, along with all-related deadlines (including the parties' deadline to file the Civil Case Management Plan, Scheduling Order and joint letter), for the reasons discussed below. Please let me know if you will consent to the request, so that we can inform the Court. Our request is based upon the following grounds:

1. **Plaintiff Failed to Properly Serve the Notice of Initial Pretrial Conference:** The Notice of Initial Pretrial Conference (ECF No. 6) ("Notice") provides that: "**Counsel who have entered a notice of appearance as of the issuance of this order are directed (1) to notify all other parties' attorneys in this action by serving upon each of them a copy of this order and the Court's Individual Rules and Practices forthwith, and (2) to file proof of such notice with the Court.**" (Emphasis in original.) Our office was not served with a copy of the Notice until your email of today's

date. We were not aware of the June 20 conference until today, when you sent your email. Moreover, when you sent us an email on May 22, 2018 notifying us of the lawsuit and providing a copy of the Complaint, you failed to attach a copy of the Notice, or otherwise provide that document in any subsequent correspondence from your office. Thus, counsel for plaintiff has failed to comply with the Court's order. Plaintiff's counsel has also failed to comply with Judge Furman's Individual Rules and Practices in Civil Case, which state, in pertinent part: "Plaintiff's counsel...is directed to promptly notify all counsel of the Notice of Initial Pretrial Conference." (p. 3, ¶ 2.)

2. **The Initial Pretrial Conference is Premature:** Pursuant to Defendant's waiver of service of the Summons and Complaint on May 23, 2018 [ECF No. 7], his response to the Complaint is not due until **July 23, 2018**. On or before that date, Defendant intends to file a motion to transfer this action pursuant to 28 U.S.C. § 1404(a) or, in the alternative, to dismiss or stay this action pursuant to the "First-Filed" rule. This motion will be based, in large part, upon the previously filed action by plaintiff Stephanie Clifford against defendant Donald Trump in the Central District of California (the "California Action"), Case No. 2:18-cv-02217-SJO-FFM. The substantial overlap between the facts, transactions and occurrences in this action and the California Action warrants a transfer of this action to the Central District of California in the interests of justice, and for the convenience of the parties and witnesses, pursuant to 28 U.S.C. § 1404(a), or, in the alternative, a dismissal or stay of this action under the principles of judicial economy and federal comity embodied in the "first-filed" rule.

The Court's order on Defendant's motion thus may obviate the need for the Initial Pretrial Conference altogether or, at the very least, until after a stay of the California Action is lifted.

3. **Scheduling Conflicts:** The parties to this action currently have a hearing scheduled in the California Action in Los Angeles on **June 21, 2018** at 1:30 pm, i.e. twenty-six (26) hours after the currently scheduled Initial Pretrial Conference. Also, I have a court appearance in another matter in the U.S. District Court in Los Angeles on June 19, 2018 at 10:00 a.m. Therefore, I am not able to fly to New York for a June 20, 2018 Initial Scheduling Conference. This conflict was created, in large part, by plaintiff's six-week delay in providing service of the Notice. I am lead counsel for Defendant and the Notice requires lead counsel be present at the Conference, which is virtually impossible to arrange at this late date, due to plaintiff's failure to provide timely notice.

In light of the above, please let us know **immediately** if your office will afford the professional courtesy of consenting to a 90-day continuance of the Initial Pretrial Conference.

Sincerely,

CHARLES J. HARDER

HARDER LLP
132 S. RODEO DRIVE, FOURTH FLOOR
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Exhibit C

From: Charles Harder
Sent: Tuesday, August 7, 2018 10:17 AM
To: Ahmed Ibrahim
Cc: Anthony Harwood; Michael J. Avenatti; John Arden
Subject: RE: Clifford v. Trump SDNY: Stipulation to Transfer

Yes. Can we expect the draft stipulation & proposed order today? Thank you.

From: Ahmed Ibrahim [mailto:aibrahim@eaganavenatti.com]
Sent: Tuesday, August 07, 2018 9:45 AM
To: Charles Harder
Cc: Anthony Harwood; Michael J. Avenatti; John Arden
Subject: Clifford v. Trump SDNY: Stipulation to Transfer

Charles:

After some consideration, Plaintiff is amenable to a stipulation consenting to transfer of this action to the Central District of California. I'm assuming you would be agreeable to such a stipulation given your motion, but please confirm. If so, I will go ahead and prepare a draft of the stipulation and proposed order for your review. Thanks.

Regards,

Ahmed Ibrahim, Esq.
520 Newport Center Drive, Suite 1400
Newport Beach, CA 92660
(949) 706-7000
(949) 706-7050 (Fax)

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Exhibit D

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STEPHEN WYNN, et al.,
Plaintiffs,
v.
JAMES CHANOS,
Defendant.

Case No. [14-cv-04329-WHO](#)

**ORDER GRANTING IN PART AND
DENYING IN PART MOTION FOR
ATTORNEYS' FEES**

Re: Dkt. No. 66

Defendant James Chanos moves for attorneys' fees after prevailing on his motions to dismiss and to strike under California's anti-SLAPP statute, having successfully argued that his speech at an academic symposium was not defamatory. *See Order* (Dkt. No. 66). He requests \$538,043.00 in fees and \$52,656.23 in costs. Plaintiffs Stephen Wynn and Wynn Resorts object, and some of their concerns are well-founded. Chanos provided no detail regarding the experience of his paralegals in support of an extremely high hourly rate, so I reduce it to a reasonable rate. I reduce his other fees by 25% because his supporting documents do not provide sufficient detail to support the large amount of hours billed by his attorneys and in any event the number of hours requested is excessive given the attorneys' skills and experience and the task at hand. In addition, I reduce by half Chanos's costs related to his expert because Chanos failed to provide any documents to support this request.

BACKGROUND

Chanos, a well-known investor and short-seller, participated in an academic symposium at the University of California, Berkeley, where he made allegedly defamatory statements about plaintiff Stephen Wynn and Wynn Resorts, Ltd. (collectively, "Wynn"). *See Wynn v. Chanos*, No. 14-CV-04329-WHO, 2014 WL 7186981, at *1 (N.D. Cal. Dec. 16, 2014). After Wynn sued Chanos, Chanos brought a motion to dismiss and motion to strike under California's anti-SLAPP

statute. *Id.* I dismissed the complaint without prejudice because I concluded that Chanos's statements were protected opinions, because the complaint did not adequately plead actual malice, and because Chanos's speech was a matter of public interest. *Id.*

After Wynn filed a first amended complaint, Chanos brought another motion to dismiss and motion to strike. *See Wynn v. Chanos*, No. 14-CV-04329-WHO, 2015 WL 971360, at *1 (N.D. Cal. Mar. 3, 2015). This time, I dismissed with prejudice and granted Chanos’s motion to strike. *Id.* I found that Wynn’s complaint failed for the same reasons as before, and that Wynn could not cure it because Chanos’s statements were not defamatory as a matter of law. *Id.* I directed Chanos to submit a motion for attorneys’ fees that he is entitled to under the California anti-SLAPP statute, which I now address. *Id.* at 4.

LEGAL STANDARD

District courts typically employ the “lodestar method” to calculate an appropriate amount of attorneys’ fees. A lodestar calculation calls for the court to multiply “the number of hours the prevailing party reasonably expended on the litigation by a reasonable hourly rate.” *Gonzalez v. City of Maywood*, 729 F.3d 1196, 1202 (9th Cir. 2013) (internal quotations omitted). In determining whether an hourly rate is reasonable, courts look to several important principles. *Id.* at 1200. Courts consider the “prevailing market rates in the relevant community,” as well as “the experience, skill, and reputation” of the attorney. *Id.* at 1200, 1205-06 (internal citations and quotations omitted). Other factors considered include “(1) the novelty and complexity of the issues; (2) the special skill and experience of counsel; (3) the quality of representation; and (4) the results obtained.” *Digital Reg of Texas, LLC v. Adobe Sys., Inc.*, No. C 12-1971 CW, 2015 WL 1968388, at *3 (N.D. Cal. May 1, 2015).

The party seeking an award of fees must establish entitlement to the award and submit evidence that supports the hours worked and the rates claimed. *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983). Fee awards calculated under the loadstar method are generally presumed to be reasonable. *Gonzalez*, 729 F.3d at 1208-09. At the same time, the court may adjust this figure “if circumstances warrant” in order “to account for other factors which are not subsumed within it.” *Ferland v. Conrad Credit Corp.*, 244 F.3d 1145, 1149 n.4 (9th Cir. 2001). “Where the

1 documentation of hours is inadequate, the district court may reduce the award accordingly.”
2 *Hensley*, 461 U.S. at 433. A reduction may account for “hours that are excessive, redundant, or
3 otherwise unnecessary.” *Id.* at 434. In addition, the Ninth Circuit has stated that a district court
4 may “impose a small reduction, no greater than 10 percent—a ‘haircut’—based on its exercise of
5 discretion and without a more specific explanation.” *Moreno v. City of Sacramento*, 534 F.3d
6 1106, 1112 (9th Cir. 2008).

7 DISCUSSION

8 I. DEFENSE COUNSEL’S HOURLY RATES

9 Wynn argues that the hourly rates of defense counsel are unreasonable because they do not
10 account for rates in the San Francisco Bay Area legal community as a whole or the rates of
11 attorneys who specialize in defamation and anti-SLAPP litigation. Oppo. 8-9 (Dkt. No. 75). It
12 also objects to Chanos’s reliance on Valeo Partners Legal Consulting because the Valeo database
13 is based upon only “twenty-five law firms from the top sixty-five AmLaw revenue generating
14 national law firms” and does not account for smaller firms performing similar services in the Bay
15 Area. *Id.* at 9. It also submits a competing analysis of the average rates of attorneys in the San
16 Francisco Bay Area. *Id.* at 10-14.

17 In considering whether the hourly rates are reasonable, I find that both parties’ submissions
18 are relevant, but not dispositive. *See Banas v. Volcano Corp.*, 47 F. Supp. 3d 957, 965 (N.D. Cal.
19 2014) (finding rates set forth in Valeo database to be relevant). Although each party spends a
20 significant amount of time arguing that its respective attorneys’ fees survey is more appropriate,
21 there is no one set matrix to be used in calculating a reasonable rate for attorneys in the Bay Area
22 who perform a certain type of work. I accordingly consider both parties’ supporting evidence as
23 well as my own experience with the prevailing market rate in such cases. *See id.* at 966.

24 Chanos is seeking the regular hourly rates charged by his lawyers for their services. The
25 hourly rates for partners Kenneth Hausman and Douglas Winthrop are \$1,035/1,085 and \$875/920
26 per hour, respectively.¹ Dkt. No. 66-5, Ex. A. Wynn asserts that reasonable rates for these
27

28 ¹ These rates reflect the initial rate of the attorney and their increased rate in 2015.

1 attorneys are \$650 and \$585 per hour. Oppo. 11. Hausman has over forty years of experience and
2 extensive experience representing clients in the financial industry. Dkt. No. 66-3 ¶ 2. Winthrop
3 has over twenty years of experience in business and IP litigation. Dkt. No. 66-6 ¶ 2. I find that
4 the rates of Hausman and Winthrop, while at the high end of the spectrum, are reasonable rates for
5 attorneys in the Bay Area. *See Banas*, 47 F. Supp. 3d at 965 (approving rates as high as \$1,095
6 per hour); *see also Digital Reg of Texas, LLC v. Adobe Sys., Inc.*, No. C 12-1971 CW, 2015 WL
7 1968388, at *3 (N.D. Cal. May 1, 2015) (The “third quartile rates in San Francisco in 2012 were
8 \$825 for partners”); *In re Magsafe Apple Power Adapter Litig.*, No. 5:09-CV-01911-EJD, 2015
9 WL 428105, at *12 (N.D. Cal. Jan. 30, 2015) (“In the Bay Area, reasonable hourly rates for
10 partners range from \$560 to \$800”).

11 The hourly rates for associates Julian Waldo and Marco Martemucci, \$570/640 and
12 \$645/710, respectively, are high. Dkt. No. 66-5, Ex. A. Waldo has over four years of experience
13 and Martemucci has approximately six years of experience. Dkt. Nos. 66-4 ¶ 2, 66-5 ¶ 2. Wynn
14 proposes rates of \$355 and \$395 per hour. Oppo. 12. The rates charged for the associates are the
15 attorneys’ regular hourly rates and are at the top end of what is reasonable in the Bay Area market.
16 *See, e.g., Digital Reg of Texas*, 2015 WL 1968388, at *3 (third quartile rate in San Francisco was
17 \$576 for associates).

18 Gary Bostwick’s requested hourly rate is \$750, which Wynn argues should be \$625. Dkt.
19 No. 66-5, Ex. A; Oppo. 13. Even Wynn characterizes Bostwick as “one of the country’s pre-
20 eminent anti-SLAPP and defamation attorneys.” Oppo. 1. Bostwick has over thirty-five years of
21 experience and focuses on First Amendment and media cases. Dkt. No. 66-1 ¶ 2. His hourly rate
22 is reasonable and within the average range of hourly rates for partners in the Bay Area.

23 Finally, Chanos submits hourly rates of \$325/340 and \$300/320 for legal assistants. Dkt.
24 No. 66-5, Ex. A. These hourly rates are extremely high for a legal assistant in San Francisco.
25 Chanos does not provide any support for the rates proffered, such as the paralegals’ years of
26 experience, background, or other factors which would support an hourly rate well above average.
27 *See* Dkt. No. 75-2 ¶ 42; *see also Banas*, 47 F. Supp. 3d at 965 (finding paralegal rates of \$245 to
28 \$290 per hour to be high but reasonable); *In re Magsafe Apple Power Adapter Litig.*, 2015 WL

1 428105, at *12 (paralegal rates and litigation staff ranged from \$150 to \$240). Wynn's expert
2 proposes an hourly rate for paralegals of \$170 per hour, which I find to be reasonable and within
3 the market rate. Oppo. 13-14. Given Chanos's failure to justify its proposed rates for the legal
4 assistants Gresham and Roberts, I calculate both of the legal assistants' rates to be \$170 per hour.

5 **II. THE AMOUNT OF HOURS SPENT**

6 Although the hourly rates for Chanos's counsel fall within the reasonable rate for attorneys
7 in the Bay Area, I emphasize that with such premium rates come "an expectation that [counsel]
8 will complete tasks efficiently and that its more senior attorneys will limit their involvement to
9 tasks requiring their level of expertise." *Banas*, 47 F. Supp. 3d at 966; *see also Hernandez v.*
10 *Grullense*, No. 12-CV-03257-WHO, 2014 WL 1724356, at *11 (N.D. Cal. Apr. 30, 2014), *appeal*
11 *dismissed* (July 18, 2014). I address that fundamental issue in addition to Wynn's several
12 objections to the amount of hours spent defending case below.

13 **A. Retention of both Arnold & Porter and Gary Bostwick**

14 Wynn contends that since Chanos retained Bostwick, a well-known defamation lawyer, it
15 was unreasonable to retain the attorneys at Arnold & Porter to complete the bulk of the work in
16 this case. Oppo. 1-2, 5-7. It states that "the vast majority of the work was performed by people
17 with less expertise and, often, at a higher rate" than Bostwick. *Id.* at 2 (emphasis omitted).

18 I am not persuaded by Wynn's argument. According to Chanos, "Arnold & Porter has
19 represented Mr. Chanos in a variety of matters for many years." Reply 2 (Dkt. No. 76). I find that
20 it is reasonable to retain both a longtime law firm that is familiar with a client and a specialist in
21 the litigation at hand. This is especially true for cases such as this one, where an individual's
22 personal reputation is at stake. *See Graham-Sult v. Claimos*, 756 F.3d 724, 753 (9th Cir. 2014)
23 (finding that it neither unreasonable nor duplicative to hire two firms in anti-SLAPP action where
24 one firm had a "longstanding relationship" with the client). Here, Chanos did not hire two
25 separate large law firms, but one large law firm and one attorney from a small law firm who
26 specializes in defamation lawsuits. Each firm brought a separate set of skills and resources, and it
27 was not unreasonable to retain both.

28 At the same time, as with the retention of attorneys with high hourly rates, Chanos's

1 retention of two firms should result in greater efficiency and a lower amount of total hours billed.
2 That did not occur here.

3 **B. Hours unrelated to anti-SLAPP motion**

4 Wynn objects to Chanos's billings for work performed on the motions to dismiss because
5 it argues that they were not "performed in connection with the anti-SLAPP motion." Oppo. 7
6 (internal quotations omitted). It argues that without timesheets indicating that the motions were
7 intertwined, Chanos is not entitled to fees related to these motions. *Id.* at 8.

8 This is unpersuasive because even without documentation to support it, it is clear that
9 Chanos's motions to dismiss were intertwined with his anti-SLAPP motions. Chanos accurately
10 notes that his motion to dismiss is largely comprised of "cut-and-paste" from the motion to strike.
11 See Reply 4; *see also* Dkt. Nos. 11, 16. Chanos is entitled to fees for all motions filed in this case,
12 given their close relation to the anti-SLAPP motion. *See Clainos*, 756 F.3d at 752 (court did not
13 abuse discretion in awarding fees for motions related to anti-SLAPP motion).

14 **C. Failure to provide timesheets**

15 Wynn claims that Chanos's fee request should be denied because he failed to provide
16 detailed timesheets reflecting the hours worked. Oppo. 3-5. It states that without these records, it
17 cannot determine whether the hours billed are excessive, duplicative, or should have been
18 performed by less senior attorneys or paralegals. *Id.* at 4.

19 Wynn cites to *Banas*, in which I found that "block billing" was insufficient to establish
20 reasonable attorneys' fees. Oppo. 4. In that case, I defined block billing as "the practice of
21 including various tasks within one time entry without specifying the time spent on each task
22 within an entry." *Banas*, 47 F. Supp. 3d at 981 n.9. I stated that "[w]ithout specifying how much
23 spent was spent on each distinct task . . . there is no way for me to determine whether the time
24 spent on any of these tasks—e.g., trial preparation, summary judgment briefing, opposition to
25 sanctions motion, preparations of jury instructions and verdict form—was reasonable." *Id.* at 967.

26 This case is somewhat different from *Banas*, because Chanos's billing records do not recite
27 a variety of tasks billed together for a certain number of hours. Instead Chanos separated his
28 billing into distinct tasks: initial investigation and preparation of the first anti-SLAPP motion,

1 preparation of the motion to dismiss, preparation of the discovery motion, preparation of the anti-
2 SLAPP reply motion, preparation of the reply to the first motion to dismiss, the first motion
3 hearing, preparation of the second anti-SLAPP motion and motion to dismiss, preparation of the
4 second set of reply briefs, and the second hearing. Dkt. No. 66-5, Ex. A. He also described the
5 work that went into such motions in his billing records, motions, and accompanying declarations.
6 The tasks are discrete enough to allow me to evaluate the reasonableness of the hours expended.

7 That said, there is merit in Wynn's argument that Chanos's proffered support does not
8 provide adequate information because it does not allow me to determine that the entries show
9 duplicative or excessive work. While Chanos's organization of billing hours is not unreasonable
10 per se, it does not provide the degree of specificity needed to justify the unreasonably large
11 amount of hours spent here. *See Banas*, 47 F. Supp. 3d at 967 ("block-billing is not inappropriate
12 *per se*, if the party seeking fees provides enough information to reveal whether the amount of time
13 spent performing tasks was reasonable") (internal quotations omitted). Since I have not been
14 given the detail to support the hours apparently expended by Chanos's counsel, I assume that there
15 is duplicative and unnecessary work buried in the request, and must rely on my judgment on the
16 reasonableness of the hours requested.

17 **D. Number of hours billed**

18 Having resolved Wynn's objections, I turn to the reasonableness of the total number of
19 hours billed. Chanos requests fees for 776.9 hours in total, amounting to \$538,043.00. Dkt. No.
20 66-5, Ex. A. He submits that the attorneys spent a total of 214.3 hours in the initial investigation
21 and first motion to strike, 43.7 hours preparing the first motion to dismiss, 121.1 hours on the
22 discovery motion, 121.2 hours on the reply to the first motion to strike, 54.7 hours on the first
23 reply to the motion to dismiss, 39.5 hours on the first hearing, 87.4 hours on the preparation of the
24 second motions to dismiss and to strike, 72.2 hours on the reply briefs for the motions to dismiss
25 and to strike, and 22.8 hours on the second hearing. *Id.*²

26 _____
27 ² Some of the math in Chanos's description of attorneys' fees does not add up. For example, for
28 the "Preparation and Attendance at Hearing on Second Anti-SLAPP and Second Motion to
Dismiss," Wynn requests \$21,003.00. *See* Dkt. No. 66-5 at 3. When calculating this amount
based upon the proffered hours and rate for the attorneys, I calculated this sum as \$21,963.00. All

1 There are several reasons why the hours requested are excessive. First, Chanos used three
2 partners, who generated nearly half of the attorney hours billed in this case, in addition to two
3 high-billing associates. 288.9 hours were billed by partners and 370.9 were billed by associates
4 out of 659.8 attorney hours in total. Dkt. No. 66-5, Ex. A. The defamation action was not
5 particularly complex and did not call for three partners to bill at high rates when less costly (and
6 hopefully highly qualified associates, given their billing rates) were equally able to complete the
7 lion's share of the work.³ While I am willing to accept the high rates that the firm charged out the
8 associates as indicative of great talent and comparable litigation experience, I concomitantly find
9 that they must have possessed the skills to complete most of the work billed in this case. Both the
10 number of partners and the amount of hours sought are unreasonable.

11 Second, it is unreasonable for Chanos to separately bill a significant number of hours
12 associated with the motions to dismiss and with the motions to strike. As discussed, “the motions
13 to dismiss were essentially just cut and paste versions of the same arguments of the anti-SLAPP
14 motions, with certain tailoring to account for the different procedural aspects of the two motions.”
15 Reply 4. The motion to strike lifted the argument in the motion to dismiss that Wynn could not
16 prevail on the merits of his claim because it failed to state a claim. *See* Dkt. Nos. 11, 16. The
17 motion to strike was different only in that it applied a different legal standard and added the
18 argument that Wynn was a public figure. Because of the similarity of the motions, it was
19 unreasonable to bill a significant amount of time for both motions, and many of the hours spent on
20 the motions to dismiss and motions to strike were duplicative and unnecessary.

21 Finally, Chanos’s descriptions of the work performed reflect the fact that the hours spent
22 were excessive. For example, Chanos stated that attorneys conducted research into whether
23 Stephen Wynn and Wynn Resorts qualified as public figures. Mot. 3 (Dkt. No. 66). This is not a
24 close question and does not require more than a few hours of research. I am also skeptical of
25 defense counsel’s description of their research into the law surrounding defamation and privilege.

26
27 the mathematical errors result in a lower requested rate for Chanos than the correct calculation
would amount to. I will therefore consider Chanos’s lower, requested amount.

28 ³ I note that the rates of the associates are as high as many partners in the Bay Area at smaller
firms.

1 *Id.* With a First Amendment expert on their team, little work was needed to determine the
2 contours of state and federal law on defamation. Billing a substantial amount of hours for such
3 work is not reasonable.

4 Put simply, given the sophistication of counsel and their substantial billing rates, this case
5 should have been litigated much more efficiently without sacrificing quality. After reducing the
6 total amount of fees requested for the reduction in the paralegals' hourly rates, discussed above, I
7 further reduce the fees sought by 25 percent, given (i) the failure of Chanos to provide sufficient
8 detail to support his request (ii) the unreasonable staffing of five skilled attorneys at high rates for
9 this motion practice, including a First Amendment expert and attorneys who were familiar with
10 Chanos and his business; (iii) the relative simplicity of this case; and (iv) the duplication of efforts
11 on preparing the motion to dismiss and the motion to strike. This level of reduction is consistent
12 both with my evaluation of the tasks involved in this relatively straightforward matter and with the
13 range for reductions in cases where parties provided less specificity than necessary to award such
14 a significant amount of fees. *See Lahiri v. Universal Music & Video Distribution Corp.*, 606 F.3d
15 1216, 1222-23 (9th Cir. 2010) (affirming reduction of 30% to account for block billing and
16 additional 10% reduction for excessive and redundant work); *Welch v. Metro. Life Ins. Co.*, 480
17 F.3d 942, 948 (9th Cir. 2007) ("block billing "may increase time by 10% to 30%."); *see also*
18 *Ingram v. Oroudjian*, 647 F.3d 925, 928 (9th Cir. 2011); *Moreno*, 534 F.3d at 1112. A reasonable
19 fee for each task identified by Chanos is 25% less than what is requested for the reasons described
20 above.

21 **III. COSTS**

22 Finally, Wynn objects to the expert costs submitted by Chanos for John A. Hawkins,
23 arguing that there is no support to justify the expense of \$32,850.00. Oppo. 14-15. It points out
24 that "[n]o information was provided as to [the expert's] hourly rate, the number of hours he
25 worked, the tasks he performed, or anything else that might be pertinent to determining whether
26 this expense is reasonable." *Id.* at 15. Chanos does not address this argument in his reply.

27 I agree with Wynn that Chanos should have provided supporting documentation to justify
28 the \$32,850.00 he requests in expert fees. *See Civil L.R. 54-1(a)* ("Appropriate documentation to

1 support each item claimed must be attached to the bill of costs.”). While this deficiency would
2 allow me to strike this request in its entirety, I am aware that Wynn caused Chanos to retain the
3 expert by hiring one of his own. The subject matter of both experts’ work was not complex, nor
4 particularly helpful. A reasonable amount is half of what Chanos seeks, or \$16,425.00, for a total
5 of \$32,231.23.⁴

6 **CONCLUSION**

7 I conclude that although the hourly rates billed by the attorneys in this case were
8 reasonable, the number of hours spent was not. After re-calculating the fees award to reflect the
9 lower rates of paralegals and reducing Chanos’s requested fees by 25% for insufficiently detailed
10 time records and an unreasonable number of hours billed, I award Chanos \$390,149.63 in fees.
11 He is entitled to \$32,231.23 in costs.

12 **IT IS SO ORDERED.**

13 Dated: June 19, 2015



14
15 WILLIAM H. ORRICK
16 United States District Judge
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28 ⁴ Wynn does not object to the remainder of Chanos’s bill of costs, and I therefore accept the
remaining costs. *See Blackburn v. ABC Legal Servs., Inc.*, No. 11-CV-01298 JSW NC, 2012 WL
1067632, at *5 (N.D. Cal. Feb. 24, 2012) report and recommendation adopted, No. C 11-01298
JSW, 2012 WL 1067551 (N.D. Cal. Mar. 28, 2012).

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DIMITRI CHARALAMBOPOULOS, §
§
Plaintiff/Counter-Defendant, §
§
v. § CASE NUMBER 3:14-cv-02424-D
§
CAMILLE GRAMMER, §
§
Defendant/Counter-Plaintiff. §

**DEFENDANT/COUNTER-PLAINTIFF CAMILLE GRAMMER'S APPENDIX TO
MOTION FOR ATTORNEYS' FEES AND OTHER EXPENSES PURSUANT TO
THE TEXAS CITIZENS PARTICIPATION ACT AND BRIEF IN SUPPORT**

RICHARD A. ROHAN
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Texas State Bar No. 24082850
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*Attorneys for Defendant/Counter-Plaintiff
Camille Grammer*

INDEX TO APPENDIX

Exhibit 1:	Declaration of Richard A. Rohan	App. 001
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Exhibit D:	April 1, 2015 Carrington Coleman Billing Statement	App. 030
Exhibit E:	July 13, 2015 Carrington Coleman Billing Statement	App. 051

Respectfully submitted,

/s/ Richard A. Rohan

RICHARD A. ROHAN

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Attorneys for Defendant/Counter-Plaintiff
Camille Grammer

CERTIFICATE OF SERVICE

The undersigned certifies a copy of the foregoing instrument was served upon the attorneys of record for the Plaintiff/Counter-Defendant in the above cause in accordance with Rule 5 of the Federal Rules of Civil Procedure, on this 1st day of September, 2015.

/s/ Richard A. Rohan

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DIMITRI CHARALAMBOPOULOS, §

§

Plaintiff/Counter-Defendant, §

§

v. §

CASE NUMBER 3:14-cv-02424-D

CAMILLE GRAMMER, §

§

Defendant/Counter-Plaintiff. §

§

DECLARATION OF RICHARD A. ROHAN

I, Richard A. Rohan, make the following declaration pursuant to 28 U.S.C. § 1746 and hereby declare under penalty of perjury that the following is true and correct:

1. My name is Richard A. Rohan. I am over the age of 21 and am otherwise competent to make this declaration. The statements in this Declaration are based on my personal knowledge and are true and correct.

2. I am a partner in the law firm of Carrington, Coleman, Sloman & Blumenthal, L.L.P. ("Carrington Coleman"). I have been licensed to practice law in the State of Texas since 1984. Attached as Exhibit A is a printout of my online firm biography, which describes some of my qualifications and experience as an attorney. I have more than thirty years of experience handling complex commercial and civil litigation matters.

3. I am an attorney of record for Defendant/Counter-Plaintiff Camille Grammer ("Grammer") in the above-entitled and numbered cause (the "Litigation"). Thomas Conner, who is also counsel of record for Ms. Grammer in this matter, is an associate at Carrington Coleman and has been licensed to practice law in the State of Texas since 2012. Mr. Conner also has

experience in representing clients in complex commercial litigation matters for Carrington Coleman.

Reasonable Hours Spent

4. Pursuant to Section 27.009 of the Texas Civil Practice and Remedies Code, Grammer is seeking the recovery of attorneys' fees from Plaintiff/Counter-Defendant Dimitri Charalambopoulos ("Plaintiff") for the hours worked by myself and Thomas Conner in defending against the Litigation and in obtaining dismissal of a number of Plaintiff's causes of action pursuant to the Texas Citizens Participation Act (the "TCPA"). In addition to attorney time, Grammer also seeks recovery from Plaintiff of fees for hours worked by Constance Nims, a Carrington Coleman paralegal, and by Norma Avila, Carrington Coleman litigation support staff. As litigation support staff, Ms. Avila's time was spent on technology-related tasks such as loading documents onto the firm's databases and preparing documents for production.

5. Copies of redacted billing records showing the time entries for which fees are being sought between June 19, 2014 and May 8, 2015 are attached as Exhibits B, C, D, and E. These billing records are from the original billing statements, but have been redacted as described below, and have hours worked broken down for tasks for which fees are being sought in this motion.

6. Removed from these billing records are time entries that were not attributable i) to preparing, researching, and fully briefing one or more of the following services: Grammer's Motion to Dismiss Plaintiff's First Amended Petition Pursuant to the Texas Citizens Participation Act [Doc. No. 13] ("TPCA Motion to Dismiss"), Grammer's Brief in Support of her TCPA Motion to Dismiss [Doc. No. 14], Grammer's Reply Brief in Support of her TCPA Motion to Dismiss [Doc. No. 30], and Grammer's Supplemental Reply Brief in Support of her

TCPA Motion to Dismiss [Doc. No 51], or ii) to participating in the specified and limited discovery conducted pursuant to the Court's January 29, 2015 Memorandum Opinion and Order. Accordingly, Grammer is not seeking recovery of fees for professional services unrelated to her TCPA Motion to Dismiss.

7. For Carrington Coleman's representation of Grammer in 2014, the following hours were spent researching, preparing, and drafting Grammer's TCPA Motion to Dismiss and accompanying briefs and reviewing and analyzing Plaintiff's response:

Name	Role	Hours	Rate	Total	
Richard Rohan	Attorney	42.5	\$520	\$22,100	
Thomas Conner	Attorney	217.1	\$280	\$60,788	
				TOTAL	\$82,888.00

Exhibits B, C / App. 12-26.

8. For Carrington Coleman's representation of Grammer in 2015, the following hours were spent reviewing, organizing, and producing documents; preparing for and defending the depositions of Camille Grammer, Scott MacLean, and Howard Bragman; reviewing Plaintiff's supplemental response; and researching, preparing, and briefing Grammer's supplemental reply brief:

Name	Role	Hours	Rate	Total	
Richard Rohan	Attorney	92.2	\$530	\$48,866	
Thomas Conner	Attorney	148.2	\$295	\$43,719	
Constance Nims	Paralegal	10.4	\$180	\$1,872	
Norma Avila	Litigation Support	8.3	\$195	\$1,618.50	
				TOTAL	\$96,075.50

Exhibits D, E / App. 34-59.

9. As a result of Grammer's TCPA Motion to Dismiss, including the attendant briefing and discovery, four out of the seven legal claims advanced by Plaintiff have been dismissed. (This calculation counts Plaintiff's negligence and gross negligence claims as separate legal claims, and also treats Plaintiff's defamation and defamation per se claims as separate legal claims, both consistent with the manner in which Plaintiff presented them in his complaint in this action.) In addition, of the three claims remaining in the case—malicious prosecution, defamation, and defamation per se—the Motion to Dismiss resulted in a substantial and meaningful reduction of alleged statements that have been found to be actionable under Plaintiff's defamation or defamation per se claims. As a result, in my opinion, it is reasonable and appropriate to discount the overall lodestar fee (the aggregate number of hours times respective hourly rates of the professionals performing those services) by a factor of one-third. By applying this adjustment to the overall lodestar fee, Grammer is thereby seeking 66.67% of the overall lodestar amount. This factor is arrived at by adding the ratio of dismissed legal claims (4/7, or approximately 57%), to a small additional factor due to the fact that many of the

significant statements alleged by Plaintiff to be defamatory, including all of the statements set forth in Grammer's Request for Domestic Violence Restraining Order setting out the details of the events of October 16, 2013, were held by the Court to be privileged and hence not actionable.

10. Applying the 66.67% factor to the aggregate fees of \$178,963.50 incurred in researching and drafting the TCPA Motion to Dismiss and accompanying briefs, responding to discovery requests, and defending depositions related to the TCPA Motion, it is my opinion that a fee of \$119,314.96 represents a reasonable fee for services performed by attorneys, legal assistants, and litigation support personnel from Carrington Coleman in connection with Grammer's TCPA Motion.

11. Based on my extensive involvement in the Litigation, as well as my observation of the work performed by Thomas Conner, Constance Nims, and Norma Avila, it is my opinion that the above hours were reasonable and were reasonably expended in defending against the Litigation and in obtaining partial dismissal of multiple of Plaintiff's causes of action pursuant to the TCPA. Among other things, my opinion is based on the time and labor required to move for dismissal on all of Plaintiff's claims and allegations under the TCPA procedure and standards; that the attorneys were required to spend time researching the TCPA's procedure, standards, and relevant case law, as well as researching and briefing the standards and merits of each of Plaintiff's seven causes of action; that the parties conducted specified and limited discovery, which included Grammer producing documents and defending three depositions; and that Grammer submitted supplemental briefing in her support of her TCPA Motion to Dismiss. This work involved complex legal matters, both procedurally and substantively, required extensive time, and produced practical benefits for the client.

Appropriate Hourly Rate

12. For 2014, my customary billing rate was \$520 per hour, and Thomas Conner's customary billing rate was \$280 per hour. For 2015, my customary billing rate is \$530 per hour, and Thomas Conner's customary billing rate is \$295 per hour. Based on my experience, these billing rates are appropriate and reasonable hourly billing rates in the Northern District of Texas for attorneys with the respective levels of experience working on cases of this nature. I am aware of many commercial litigation attorneys with the same, or even fewer years' experience than I, whose hourly billing rates exceed \$530, often by a substantial amount. The same is true of Mr. Conner's hourly billing rate compared to other associates with similar practices in the Dallas area.

13. For 2015, Constance Nims's customary billing rate is \$180 per hour, and Norma Avila's customary billing rate is \$195 per hour. Based on my experience, it is my opinion that these are reasonable rates for services provided by paralegals and litigation support staff in the Northern District of Texas.

14. Based on my experience practicing law and handling cases of this nature, it is my opinion that \$119,314.96 is a reasonable and appropriate attorneys' fee for the work performed by Carrington Coleman during its representation of Grammer in obtaining dismissal of multiple of Plaintiff's causes of action pursuant to the Texas Citizens Participation Act.

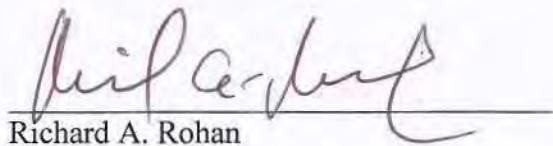
15. For purposes of this Litigation, Carrington Coleman agreed to a special blended rate for the hourly fees charged by the attorneys at Carrington Coleman, but under that blended rate, the aggregate fees described in paragraphs seven and eight total \$178,490.50, and the reduced amount sought under the 66.67% factor would be \$118,999.61.

Other Expenses

16. \$1,709.25 was incurred in travel expenses to prepare for and to defend the depositions of Camille Grammer, Scott MacLean, and Howard Bragman. \$1,752.66 was incurred in expenses to obtain the transcripts and videos of the depositions of Camille Grammer, Scott MacLean, and Howard Bagman. Exhibit D / App. 47, 50. Applying the 66.67% factor determined in paragraph nine to the aggregate expenses of \$3,461.91, Grammer is seeking \$2,308.05 in other expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas, Texas on September 1, 2015.



Richard A. Rohan



RICHARD A. ROHAN

Partner

P: 214-855-3043 F: 214-758-3743 rrohan@ccsb.com

AREAS OF PRACTICE

A Arbitration & Trial, Broker Dealer Disputes, Business Ownership Disputes, D & O Litigation, Derivative & Shareholder Litigation, Environmental & Remediation, Estate / Probate / Guardianship Disputes, Oil & Gas Litigation, Professional Liability, Securities & Directors & Officers, Securities Class Actions

"My ideal client is one who can distinguish a lawyer's bluster from true passion and see the value of honesty and integrity."

At the most basic level, it is fundamentally important for an attorney to understand the client's case. Perhaps equally important, however, is to understand the other side's case.

That's why Richard Rohan gets inside the thought process of the opposing players, from principals to attorneys. This gives him the foresight to anticipate their next move and handle what's likely to happen next.

His clients often find him pushing hard on his own case's weakest spots and finding flaws with what might have seemed an invulnerable position. By preparing for the worst-case scenario, he's ready for the opposition's strongest argument. Given his closeness to the case, he's in the best position to do so and often discovers the other side hasn't discovered many of the issues that he has.

It's this desire to be unflinchingly honest that contributes to his success. Richard fights with integrity, ensuring his clients' business objectives drive his strategy because that's what clients want.

Richard finds satisfaction knowing that his clients can trust his judgment, counsel, and advice in addition to his litigation skills. From entrepreneurial start-ups to large corporations, the value he places on building lasting client relationships fosters a sense of loyalty on both sides.

Experience

Constitutional Law

Succeeded in persuading the Supreme Court of Texas to strike down Tarrant County prison chaplaincy program as violating the First Amendment Establishment Clause.

Oil and Gas

Obtained unanimous jury verdict requiring oil and gas producer to offer \$40 million-interest in producing property to client pursuant to Area of Mutual Interest Clause.

Legal Malpractice

Successfully defended attorney and law firm from malpractice claims arising out of real estate transactions involving Dallas design district.

Successfully defended AmLaw 100 firm against claims of malpractice arising out of pre- and post-petition bankruptcy representation.

Contract/Governmental

Obtained summary judgment in favor of appraisal district against claims of breach of contract, theft of trade secrets, and tortious interference in connection with software development agreement.

Successfully defended corporation in arbitration against claim for earn-out payments following asset sale of telephone directory business.

Education

Harvard Law School
J.D., *cum laude*, 1984

Harvard College
A.B., *cum laude*, 1981

Court Admissions

Texas, 1984
Texas Supreme Court
U.S. District Courts for the Northern, Southern, Eastern and Western Districts of Texas
U.S. Court of Appeals for the Fifth Circuit
U.S. Supreme Court

Speeches/Publications

Brewers Bring Suit Against The TABC For Unconstitutional Taking, Carrington Coleman Capital Newsletter,
2015 Issue Two.

San Antonio Court of Appeals Issues Important Opinion in Chesapeake Royalty Dispute, Carrington Coleman
Capital Newsletter, Special Oil and Gas Industry Edition, 2014.



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July 7, 2014

Bill #: 313856
Page 1

028577 Grammer, Camille
0001 Dimitri Charalambopoulos

Professional services rendered through 06/30/14:



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07/07/14

Bill Number: 313856

Page 2

DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE

DESCRIPTION OF SERVICES

TKPR



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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE

DESCRIPTION OF SERVICES

TKPR

06/19/14

Researched TX Anti-SLAPP Statute (4.0)

TSC



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07/07/14

Bill Number: 313856
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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
06/20/14	Researched TX Anti-SLAPP Statute (2 . 8)	TSC

06/27/14	Researched TX Anti-SLAPP Statute (2 . 1)	TSC
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07/07/14

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DESCRIPTION OF EXPENSES



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October 3, 2014
TO:

Bill #: 315435
Page 1

028577 Grammer, Camille
0001 Dimitri Charalambopoulos

Professional services rendered through 09/30/14:



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10/03/14

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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
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07/18/14	Drafted Brief in Support of Anti-SLAPP Motion to Dismiss (2.7);	TSC
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07/21/14	Researched and drafted Brief in Support of Anti-SLAPP Motion to Dismiss (4.2);	TSC
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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
07/22/14	Researched and drafted Brief in Support of Anti-SLAPP Motion to Dismiss (2.5);	TSC
07/23/14	Researched and drafted Brief in Support of Anti-SLAPP Motion to Dismiss (7.1)	TSC
07/24/14	Confer w/T. Conner re: anti-LAPP motion; strategy; (2.8)	RAR
07/24/14	Conferred with R. Rohan about Brief in Support of Anti-SLAPP Motion to Dismiss (1.0); Drafted and researched Brief in Support of Anti-SLAPP Motion to Dismiss (5.7);	TSC
07/25/14	Drafted and researched Brief in Support of Anti-SLAPP Motion to Dismiss (7.0);	TSC
07/26/14	Drafted and researched Brief in Support of Anti-SLAPP Motion to Dismiss (2.7)	TSC
07/28/14	Drafted and researched Brief in Support of Anti-SLAPP Motion to Dismiss (6.2);	TSC
07/29/14	, edit brief under anti-SLAPP statute; review literature on anti-SLAPP legislation; (2.0)	RAR



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10/03/14

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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
07/29/14	Conferred with R. Rohan about Brief in Support of Anti-SLAPP Motion to Dismiss (0.6); Reviewed case law in Brief in Support of Anti-SLAPP Motion to Dismiss (2.7); Researched issue and claim preclusion (2.0)	TSC
07/30/14	confer w/T. Conner re: anti-SLAPP motion/brief, 12(b)(6) motion/brief; (0.9)	RAR
07/30/14	Conferred with R. Rohan about Brief in Support of Anti-SLAPP Motion to Dismiss (0.9); Researched issue and claim preclusion (3.4); Researched and Revised Brief in Support of Motion to Dismiss (6.0)	TSC
07/31/14	analysis and planning re: possible res judicata/collateral estoppel defenses (.3);	RAR
07/31/14	Conferred with R. Rohan about issue and claim preclusion (0.4); Call with R. Rohan, L. Stein, and A. Yeargan re: discovery issues and Anti-SLAPP Motion to Dismiss (0.8); Drafted Declaration of L. Stein (0.5); Research for Anti-SLAPP Motion to Dismiss re: matter of public concern and limited purpose public figure (4.8); Revised Anti-SLAPP Motion to Dismiss (3.9)	TSC
08/01/14	Revised Brief in Support of Anti-SLAPP Motion to Dismiss (3.1); Conferred with R. Rohan about claim preclusion (0.2); Drafted Appendix to Brief in Support of Anti-SLAPP Motion to Dismiss (0.4); Researched claim preclusion (1.4)	TSC
08/02/14	Researched negligence, fraud, and claim preclusion (3.8); Revised Brief in Support of Anti-SLAPP Motion to Dismiss (3.7)	TSC
08/03/14	Revised Brief in Support of Anti-SLAPP Motion to Dismiss (1.3)	TSC



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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
08/04/14	Confer w/T. Conner re: revised brief; review, edit anti-SLAPP brief; (3.5)	RAR
08/04/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (6.1); Drafted Affidavit of Camille Grammer (1.1); Researched TX Anti-SLAPP standards (1.2); Conferred with R. Rohan re: Brief (0.3);	TSC
08/05/14	Confer w/ T. Conner re: brief; (0.3)	RAR
08/05/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (6.6); Conferred with R. Rohan re: Brief (0.3); Revised Affidavit of C. Grammer (0.5); Researched TX Anti-SLAPP standards (0.8)	TSC
08/06/14	Attention to motion to dismiss and brief; (4.4)	RAR
08/06/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (6.2); Researched malicious prosecution (2.1); Drafted and revised affidavits of C. Grammer, S. MacLean, and A. Born (3.4); Conferred with R. Rohan re: Brief and Affidavits (0.7)	TSC
08/07/14	Review, revise motions/briefs (to dismiss, (3.0)	RAR
08/07/14	Conferred with R. Rohan re: Brief in Support of Anti-SLAPP Motion to Dismiss (0.4); Reviewed and revised Brief in Support (2.4); Revised Affidavits of C. Grammer, S. MacLean, and A. Born (1.1);	TSC
08/08/14	Conference call re: upcoming filings (0.6)	RAR



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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	
08/08/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (4.2); MacLean and L. Stein (0.9); Researched Texas Anti-SLAPP case law and CA collateral estoppel (2.1)	TSC
08/09/14	Researched Texas Anti-SLAPP standards (2.0)	TSC
08/10/14	Verified factual and legal citations in Brief in Support of Anti-SLAPP Motion to Dismiss (7.5)	TSC
08/11/14	review, edit brief (1.5)	RAR
08/11/14	Reviewed and revised Brief in Support of Anti-SLAPP Motion to Dismiss (2.7); Researched collateral estoppel under CA law (1.3); Compiled Appendix in Support of Brief in Support of Anti-SLAPP Motion to Dismiss and entered citations (2.3); Drafted Proposed Orders (0.9); Revised Declaration of R. Rohan (0.2); Conferred with R. Rohan re: Brief in Support (0.5); Call with A. Yeargan re: Brief in Support (0.2);	TSC
08/12/14	Review papers to be filed briefs); (1.2)	to dismiss; supporting RAR
08/12/14	Reviewed Brief in Support of Anti-SLAPP Motion to Dismiss and other papers to be filed (3.1); Prepared documents for filing (1.3); Conferred with R. Rohan about Anti-SLAPP Motion to Dismiss (0.1)	TSC
08/13/14	Researched TCPA prima facie case and malicious prosecution claim (3.3);	TSC



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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
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08/15/14	Researched TCPA prima facie case (2.2);	TSC
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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	
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TKPR

09/02/14		RAR
	review opposition to motion to dismiss; (1.0)	
09/02/14		TSC

Reviewed Plaintiff's Response to Anti-SLAP Motion to Dismiss
(2.2); Reviewed cases cited in Plaintiff's Response (1.2)



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10/03/14

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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
09/03/14	Review opposition; responses; (1.7)	RAR
09/03/14	Reviewed cases cited in Plaintiff's Response (2.4); Drafted Objections to Plaintiff's Appendix in Support of Response Brief (2.8);	TSC
09/04/14	review pleadings; Prepare for conference call; conference call with Liner attorneys; analysis and planning re: reply briefing; (3.8)	RAR
09/04/14	Research for Reply Brief to Anti-SLAPP Motion to Dismiss (2.9); Drafted Objections to Plaintiff's Appendix in Support of Response Brief (2.1); Conference Call with R. Rohan, L. Stein, and A. Yeargan re: Reply Brief (1.4);	TSC
09/05/14	Review briefs (2.8); analysis and planning re: content of reply brief (2.4);	RAR
09/05/14	Drafted Reply Brief to Anti-SLAPP Motion to Dismiss (4.8); Call with R. Rohan re: Reply Brief (0.5)	TSC
09/07/14	Drafted Reply Brief to Anti-SLAPP Motion to Dismiss (3.0);	TSC
09/08/14	Drafted Reply Brief to Anti-SLAPP Motion to Dismiss (5.3); Drafted Objections to Plaintiff's Appendix in Support of Response Brief (1.0);	TSC
09/09/14	review, revise reply brief; (3.5)	RAR
09/09/14	Drafted and revised Reply Brief to Anti-SLAPP Motion to Dismiss (5.1); Conferred with R. Rohan re: Reply Brief to Anti-SLAPP Motion to Dismiss (0.5);	TSC



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10/03/14

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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
09/10/14	Revise reply brief; (1.8)	RAR
09/10/14	Research for Reply Brief to Anti-SLAPP Motion to Dismiss (2.6); Revised SLAPP Reply Brief (3.5); Conferred with R. Rohan re: SLAPP Reply Brief (0.3); Drafted Appendix in Support of Reply Brief (0.5)	TSC
09/11/14	Review, revise reply brief on motion to dismiss; (2.5)	RAR
09/11/14	Revised Reply Brief to Anti-SLAPP Motion to Dismiss (2.4); Revised Objections to Plaintiff's Appendix in Support of Response Brief (1.0); Research for Objections to Appendix (1.9)	TSC
09/12/14	Review, revise ; reply brief; (1.5)	RAR
09/12/14	Research for Objections to Appendix (0.7); Call with A. Yeargan re: reply briefing (0.3); Reviewed and revised Reply Brief to Anti-SLAPP Motion to Dismiss (2.8); Reviewed and revised Objections to Plaintiff's Appendix in Support of Response Brief (3.7);	TSC
09/13/14	Review proposed edits to reply; (0.5) ;	RAR
09/15/14	Review, revise reply brief; (0.5)	RAR
09/15/14	Cite and fact check of Reply Brief to Anti-SLAPP Motion to Dismiss, (1.6)	TSC

Conferred with R. Rohan re: Reply Briefs (0.2); Revised Reply Brief to Anti-SLAPP Motion to



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10/03/14

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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	
	Dismiss (0.6);	TKPR

09/16/14	Revised Objections to Plaintiff's Appendix in Support of Response Brief (0.8); Reviewed and prepared pleadings in anticipation of filing (3.1);	TSC
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10/03/14

Bill Number: 315435
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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
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10/03/14

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DETAIL OF PROFESSIONAL SERVICES RENDERED



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DESCRIPTION OF EXPENSES



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April 1, 2015
TO:

Bill #: 318610
Page 1

028577 Grammer, Camille
0001 Dimitri Charalambopoulos

Professional services rendered through 03/31/15:



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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE

DESCRIPTION OF SERVICES

TKPR



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DETAIL OF PROFESSIONAL SERVICES RENDERED

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01/29/15	review order; phone w/client; (3.0)	RAR
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01/29/15		TSC
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Reviewed and analyzed order on
TCPA Motion to Dismiss (2.4); Conference call with C. Grammer,
L. Stein, A. Yeargan, and R. Rohan re: order (0.7)

01/30/15	Review order; (1.5)	RAR
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01/30/15	Reviewed and analyzed order on TCPA Motion to Dismiss (1.2);	TSC
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DETAIL OF PROFESSIONAL SERVICES RENDERED

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02/01/15	Review order; analysis and planning re: discovery; (1.5)	RAR
02/02/15	analysis and planning; telephone calls w/G. Fisher re: limited discovery; (3.9)	RAR
02/02/15	Researched absolute privilege and republication under TX law (4.9); Call with L. Stein, A. Yeargan, and R. Rohan re: expedited SLAPP discovery (0.6); Document review of client documents for SLAPP discovery (0.8); Correspondence with document review vendor (0.3)	TSC
02/03/15	Researched absolute privilege and republication under TX law (2.0); Call with A. Yeargan re: SLAPP discovery (0.1); Document review of client documents for SLAPP discovery (0.3);	TSC
02/04/15	Document review of client documents for SLAPP discovery (5.5)	TSC
02/05/15	Conference with attorney regarding witness files. (0.1)	CN
02/05/15	telephone calls w/G. Fisher re: discovery; (0.2)	RAR
02/05/15	Document review of client documents for SLAPP discovery (7.1); Reviewed Plaintiff's Requests for Production (0.6); Call with S. MacLean re: document requests (0.4); Correspondence with R. Rohan and L. Stein re: RFP (0.1)	TSC



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02/06/15	Inter-office communications with Thomas Conner re: Relativity native export (.10); Download documents from (.10); Analysis, review, organization of downloaded data and prepare copy set for Thomas Conner's analysis and review (1.2)	NA
02/06/15	review discovery requests; i (0.3)	RAR
02/06/15	Document review of client documents for SLAPP discovery (4.4); Drafted Objections and Responses to Plaintiff's Requests for Production (2.5)	TSC
02/07/15	Document review of client documents for SLAPP discovery (2.4)	TSC
02/09/15	document requests; (0.2)	review RAR
02/09/15	Document review of client documents for SLAPP discovery (1.8); Drafted Objections and Responses to Plaintiff's Requests for Production (0.5); Drafted memorandum re: absolute privilege and republication under TX law (2.6)	TSC
02/10/15	Conference with attorney regarding upcoming deposition of Camille Grammer. (0.1)	CN
02/10/15	Review documents for production; i (1.0)	RAR
02/10/15	Document review of client documents for SLAPP discovery (2.3); Meeting with R. Rohan re: documents for SLAPP discovery (0.7); Drafted memorandum re: absolute privilege and republication under TX law (2.0); Researched qualified privilege and drafted memorandum (2.9); Compiled documents in preparation for depositions of C. Grammer, S. MacLean, and H. Bragman (0.5)	TSC
02/11/15	Conference with attorney regarding witness binders in preparation for upcoming depositions. (0.1)	CN



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02/11/15	review documents for possible production; (2.5)	RAR
02/11/15	Document review of client documents for SLAPP discovery (1.2); Revised memorandums re: absolute privilege / republication and qualified privilege (1.3); Call with A. Yeargan re: SLAPP discovery (0.2);	TSC
02/12/15	Conference with attorney regarding upcoming depositions, and document production; Review client documents and forward to the copy center with instructions for copying (0.6)	CN
02/12/15	Review documents for production; (1.7)	RAR
02/12/15	Collected and reviewed client documents for SLAPP discovery production (4.2); Conferred with R. Rohan re: SLAPP discovery production (0.2); Conferred with C. Nims re: document production and witness files (0.1); Revised Objections and Responses to Plaintiff's Requests for Production (1.2); Researched absolute privilege and republication under TX law (1.9)	TSC
02/13/15	Begin making copies and organizing documents to be used during the witness interviews of Scott McLean, Howard Bragman, and Camille Grammer. (2.2)	CN
02/13/15	Review documents for production; (1.0) analysis and planning re: deposition timing and preparation; (1.0)	RAR
02/13/15	Collected and reviewed client documents for SLAPP discovery production (2.0); Compiled documents for witness files (2.7);	TSC



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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
02/17/15	Finish making copies and organizing documents to be used during the witness interviews of Scott McLean, Howard Ragman, and Camille grammar. (2.3)	CN
02/17/15	review documents for (1.5) production; telephone calls w/Guy Fisher re: scheduling; (0.2)	RAR
02/17/15	Collected and reviewed client documents for SLAPP discovery production (3.1); Call with C. Grammer re: client documents (0.4); Call with A. Yeargan re: discovery production (0.2); Prepared witness prep files (2.6);	TSC
02/18/15	Complete the review, and organization, of documents to be used during the witness preparation of Camille Grammer, Scott MacLean, and Howard Bragman. (0.8)	CN
02/18/15	attention to discovery; (0.5)	RAR
02/18/15	Compiled and prepared witness prep binders (1.4); Collected and reviewed client documents for SLAPP discovery production (4.2); Revised Objections and Responses to Plaintiff's Requests for Production (0.1); Meetings with C. Nims re: SLAPP discovery production (0.5)	TSC
02/19/15	Review and redact documents in preparation for production, tagging those documents to withhold at this time, and those that are non-responsive. (1.0)	CN



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DETAIL OF PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION OF SERVICES	TKPR
02/19/15	Inter-office communications with Connie Nims and Thomas Conner re: preparation of documents for production (.20); Analysis, review, organization of electronic documents and load in Concordance for review and redaction in anticipation of production (1.10); Review e-mail from Connie Nims re: documents tagged for production (.10); Analysis, review, preparation of documents for production (1.20)	NA
02/19/15	Review documents and objections/responses to document (1.5) request; plan for deposition preparation; (0.5)	RAR
02/19/15	Collected and reviewed client documents for SLAPP discovery production (1.2); Reviewed production documents and witness binders (3.8); Conferred with C. Nims re: document production (0.1); Call with A. Yeargan re: document production and objections to Plaintiff's RFP (0.7); Revised Objections and Responses to Plaintiff's Requests for Production (1.8); Conferred with R. Rohan re: document production (0.3)	TSC
02/20/15	Review the documents received from Liner Law Firm, redact plaintiff's birthrate from all copies of the Restraining Order paperwork, redact Bragman's documents, and tag documents for production; Print documents, organize for attorney in preparation witness interviews. (2.5)	CN
02/20/15	Inter-office communications with Thomas Conner and Connie Nims re: preparation of documents for production (.30); Analysis, review, preparation of documents for production (4.00)	NA
02/20/15	review documents for production; deposition preparation; (1.0) (2.3)	RAR
02/20/15	Revised Objections and Responses to Plaintiff's Requests for Production (0.6); Prepared and served SLAPP discovery production (4.1); Conferred with R. Rohan re: production (0.1); Reviewed witness prep binders (1.5); Revised memorandum re: qualified privilege (1.0);	TSC
02/21/15	Revised memorandums to R. Rohan re: absolute privilege, republication, (1.0)	TSC



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02/22/15	review research; review documents in connection with deposition preparation; (0.8)	RAR
02/23/15	Review documents; prepare for meeting with client and witnesses for deposition preparation; (4.5)	RAR
02/23/15	Drafted legend of relevant phone numbers from text messages (0.7);	TSC
02/24/15	Prepare for meetings with witnesses; witness preparation for depositions; analysis and planning (8.0)	RAR
02/24/15	Conferred with R. Rohan re: document production (0.2);	TSC
02/25/15	Conference with attorney regarding status of production, and location of additional client documents. (0.4)	CN
02/25/15	Prepare for meetings with witness (H. Bragman); witness preparation; study/analysis-correspondence; analysis and planning (8.0)	RAR



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03/02/15	Review court opinion in anticipation of upcoming depositions; telephone calls w/Guy Fisher re: discovery; (2.0)	RAR
03/03/15	review deposition notices; review cases on transmission of pleadings (0.5) and privilege; (0.5)	RAR
03/04/15	Review documents, prepare for video conference with client; deposition preparation; video conference; (6.7)	RAR
03/05/15	analysis and planning re: upcoming depositions; evidence organization; correspondence re: depositions; (1.2)	RAR
03/06/15	Prepare for call with C. Grammer; call w/Grammer to prepare for deposition; (0.8)	RAR
03/08/15	Prepare for meetings, preparation with witnesses; (0.7)	RAR
03/09/15	Prepare witnesses (Grammer, MacLean) for depositions; (8.0)	RAR
03/10/15	Conference with attorney regarding documents needed for witness interviews; Forward client documents to attorney. (0.3)	CN
03/10/15	Prepare, defend depositions of C. Grammer and S. MacLean (9.5)	RAR
03/11/15	Prepare for and defend deposition (H. Bragman); (2.5)	RAR



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03/13/15	Revised memorandums to R. Rohan re: absolute privilege, (0.5)	TSC
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03/19/15	Researched absolute privilege (1.5);	TSC
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DETAIL OF PROFESSIONAL SERVICES RENDERED

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03/30/15	Researched absolute/qualified privilege and defamation standards under TX/CA law (3.9);	TSC



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DESCRIPTION OF EXPENSES



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DESCRIPTION OF EXPENSES

DATE	DESCRIPTION	AMOUNT
03/18/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239386; DATE: 3/18/2015 - Video copies for depos of Scott MacLean & Camille Grammer	377.74
03/26/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239435; DATE: 3/26/2015 Depo transcript of Grammer	668.92
03/26/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239436; DATE: 3/26/2015 Depo transcript of MacLean	338.50
03/26/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239437; DATE: 3/26/2015 Depo transcript of Bragman.	262.50
03/26/15	Court reporters / transcripts: VENDOR: Hines Reporters; INVOICE#: 239434; DATE: 3/26/2015 Video of Bragman depo.	105.00



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DESCRIPTION OF EXPENSES

DATE	DESCRIPTION	AMOUNT
02/19/15	Travel expenses: VENDOR: Richard A. Rohan; INVOICE#: PEQBMI; DATE: 2/19/2015 Expense: Airfare Trip To: Los Angeles Travel Dates: 3/9/15 - 3/11/15 Purpose of Trip: Meet with Client and California Counsel	397.20
02/24/15	Travel expenses: VENDOR: Richard A. Rohan; INVOICE#: 2-24-15; DATE: 2/24/2015 Expense: Hotel, Taxi, Airport Parking Trip to: Los Angeles Travel Date: 2/24/15 -2/25/15 Purpose of Trip: Meeting with client and California counsel.	463.87
03/09/15	Travel expenses: VENDOR: Richard A. Rohan; INVOICE#: 3-9-15; DATE: 3/9/2015 Expense: Hotel, Taxi, Airport Parking Trip To: Los Angeles Travel Dates: 3/9/15 - 3/11/15 Purpose of Trip: Meeting with client and California counsel to prep client for and attend depositions.	848.18



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July 13, 2015
TO:

Bill #: 320736
Page 1

028577 Grammer, Camille
0001 Dimitri Charalambopoulos

Professional services rendered through 06/30/15:



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04/06/15	Researched recent TCPA cases (1.6)	TSC
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choice of law for supplemental briefing (1.8); Researched



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04/24/15	review brief; (1.0)	RAR
04/24/15		TSC

Reviewed Plaintiff's Supplemental Response to TCPA Motion to Dismiss (0.9)

04/26/15	Review brief; analysis and planning re: response; (1.5)	RAR
04/27/15	Confer w/T. Conner re: reply brief; (0.3)	RAR

04/27/15	Reviewed Plaintiff's Supplemental Response to TCPA Motion to Dismiss and outlined response (1.2); Conferred with R. Rohan re: reply to Plaintiff's Supplemental Response (0.3); Drafted Supplemental Brief in Support of TCPA Motion to Dismiss (5.1); Researched absolute privilege for transmission of pleadings (0.6); Drafted Objections to the Affidavit of Stephen Gonzales (1.4);	TSC
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04/28/15		RAR
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strategy re: drafting reply brief on SLAPP motion; (1.0)

04/28/15		TSC
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Researched hearsay exception for admission against interest (0.7); Drafted Supplemental Brief in Support of TCPA Motion to Dismiss (2.3)

04/29/15		TSC
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Researched privilege for supplemental briefing (0.7);

04/30/15	Review draft brief; (0.5)	RAR
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04/30/15	Drafted Supplemental Brief in Support of TCPA Motion to Dismiss (3.6);	TSC
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05/01/15	Researched absolute privilege for transmission of pleadings (1.3); Revised Supplemental Brief in Support of TCPA Motion to Dismiss (1.0);	TSC
05/03/15	Review draft brief; (1.0)	RAR
05/04/15	Review, edit brief and objections; (1.0)	RAR
05/04/15		TSC
	Conferred with R. Rohan re: Supplemental Brief and TCPA research (0.5); Revised Supplemental Brief in Support of TCPA Motion to Dismiss (2.9); Revised Objections to the Affidavit of Stephen Gonzales (0.8)	
05/05/15	review draft reply brief; review proposed affidavit; (3.5)	RAR
05/05/15	Researched hearsay exception for admission against interest (0.8); Conferred with R. Rohan re: Supplemental Brief (0.3); Revised Supplemental Brief in Support of TCPA Motion to Dismiss (4.3); Reviewed Affidavit of C. Grammer (0.3); Correspondence with L. Stein and A. Yeargan re: TCPA standards, Supplemental Brief, Affidavit of C. Grammer (0.9);	TSC



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05/06/15	Revise reply brief; strategy; (1.5)	call to discuss brief; RAR
05/06/15	Reviewed Affidavit of C. Grammer (0.3); Revised Supplemental Brief in Support of TCPA Motion to Dismiss (3.7); Call with L. Stein and A. Yeargan re: comments to Supplemental Brief (0.5); Correspondence with A. Yeargan, L. Stein, and C. Grammer re: Supplemental Brief (0.3)	TSC
05/07/15	review, edit reply brief; (1.0)	RAR
05/07/15	Researched absolute privilege for transmissions of pleadings (1.1); Cite checked Supplemental Brief in Support of TCPA Motion to Dismiss (2.6); Conferred with R. Rohan re: Supplemental Brief (0.2); and reviewed Supplemental Brief (1.9);	TSC Revised
05/08/15	Review, revise brief; (0.9)	RAR
05/08/15	Revised Supplemental Brief in Support of TCPA Motion to Dismiss (1.2); Researched absolute privilege for transmissions of pleadings (0.9) Reviewed Supplemental Brief (0.9); Conferred with R. Rohan re: Supplemental Brief (0.2); Call with A. Yeargan re: Supplemental Brief (0.2); Prepared for and filed Supplemental Brief (0.8);	TSC



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